

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Petition of:)	
)	
Comcast Cable Communications, LLC)	
on behalf of its subsidiaries and affiliates)	CSR-8504-A
)	
For Modification of the Television Market of)	
Station KQSL, Channel 8, Fort Bragg, California)	
)	

To: The Secretary
For delivery to: Chief, Cable Services Bureau

OPPOSITION TO PETITION FOR SPECIAL RELIEF

Jeff Chang, licensee of television station KQSL, Fort Bragg, California (the "Station"), hereby opposes the Petition for Special Relief filed by Comcast Cable Communications, LLC ("Comcast") requesting modification of the San Francisco-Oakland-San Jose DMA to exclude certain communities (the "Cable Communities") from the Station's must-carry market.

Comcast's Petition ignores the historical context of the Station, which was recently acquired by Chang after years of operating as a satellite station and, most recently, being taken off air entirely for almost a year by its previous owner. As essentially a "new" station, KQSL should not have its market unreasonably restricted before it is even able to establish itself. Since acquiring the Station, Chang has invested significant resources to improve the Station's technical service, as well as to develop a new, locally-focused programming service targeting Asian and Asian-American viewers and the many residents of the market interested in high tech issues.

Comcast's Petition mischaracterizes the Station's history and programming, and ignores the

cultural, social, and economic links between Fort Bragg and the Cable Communities demonstrating that those communities constitute a single market.

Comcast appears to want the Bureau to rush to eliminate the Cable Communities from KQSL's market before the Station is allowed to establish itself. Comcast urges the Bureau to reach a decision prior to the next round of must-carry elections, claiming that this will somehow conserve Commission resources, although it offers no support for this claim. Indeed, the claim is simply illogical, as the Bureau's analysis of the inclusion of the Cable Communities in the market is unaffected by any retransmission consent/must-carry cycle. Indeed, granting Comcast's petition precipitously would only result in additional expense for the Commission and all interested parties, as the Station in the future would be forced to petition to have communities added back to its market after it has completed its relaunch under new ownership and established viewership in those areas. Comcast's petition also is premature, as Chang has withdrawn any demand for carriage on Comcast's systems in the Cable Communities while he completes upgrades to the Station's facilities and programming.

Comcast's apparent desire to deny carriage of KQSL throughout most of the DMA also appears contrary to the spirit of the Memorandum of Understanding ("MOU") entered into between Comcast Corporation and NBC Universal and certain Asian American Leadership Organizations as a condition of the merger of Comcast and NBC Universal. In that MOU, Comcast pledged to work to enhance the distribution of programming owned by, and/or operated by, Asian-Americans.¹ KQSL is, to Chang's knowledge, the only full-power television station in the United States wholly owned by a Chinese-American, and one of only two minority-owned

¹ See *Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc.*, Memorandum Opinion and Order, 26 FCC Rcd 4238, 4477, Appendix G (2011).

stations in the San Francisco-Oakland-San Jose DMA.² KQSL is also developing a program service targeted towards Asian and Asian-American viewers.³ Denying carriage of KQSL in this market, particularly in light of its significant Asian-American population, would seem to be contrary to the spirit of the MOU and Comcast's assurances to the Asian-American community.

I. Historical Carriage Should be Discounted for a "New" Station Such as KQSL

While Comcast spends significant effort arguing that the Cable Communities should be removed from KQSL's must-carry market due to a lack of historical carriage and ratings, these arguments fail to reflect the reality of the Station's history. As the Commission has held previously, the simple fact of a lack of historical carriage is not determinative, but rather the Commission "must consider the circumstances contributing to this lack of historical carriage."⁴ Where there has been a fundamental change in a station's identity, such as through a change in ownership or programming, the lack of historical carriage is afforded little significance.⁵ Indeed, the Commission has noted that "if [historical carriage] were found to be controlling that would, in effect, prevent newer or weaker stations from ever being entitled to carriage, contrary to the policy of the statute."⁶

In this case, KQSL is for all intents and purposes a new station; it recently has undergone a complete change in ownership and the Station's new owner is working to implement a

² See Declaration of Jeff Chang, at Attachment A hereto.

³ *Id.*

⁴ *CoxCom, Inc., Petition for Modification of the DMA Market of Television Broadcast Station KFPH(TV), Flagstaff, Arizona*, Memorandum Opinion and Order, 17 FCC Rcd 17192, 17195 at ¶ 6 (2002).

⁵ *See, e.g., Comcast Cablevision of Danbury, Inc., Petition For Modification of the DMA Market of Television Broadcast Station WFUT(TV), Newark, New Jersey*, Memorandum Opinion and Order, 18 FCC Rcd 274, 278 at ¶ 8 (2003).

⁶ *Paxson San Jose License, Inc.; For Modification of Station KLXV-TV's ADI*, Memorandum Opinion and Order, 12 FCC Rcd 17520, 17525 at ¶ 11 (1997).

dramatically revised programming schedule to better serve residents of the Cable Communities and the rest of the market. Deletion of the Cable Communities from the Station's market would undermine the Station's ability to develop this programming service before it began, would disserve residents of those communities, and would contravene the purposes of the Cable Act.

Throughout essentially all of its history, KQSL (which previously operated under call signs KFWU and KUNO-TV) was operated in a parent/satellite relationship.⁷ From the time the Station commenced operation, it has operated as a stand-alone station for only a brief period in 1997. In 2008, the licensee of the Station declared bankruptcy and in 2009, the Station was sold to a new licensee, TTBG/KUNO License Sub, LLC.⁸ Only weeks after acquiring the Station, TTBG/KUNO License Sub, LLC suspended operations for financial reasons.⁹ The Station resumed operations only in October 2010, the same month that Chang, the current licensee, acquired the Station.¹⁰

Since acquiring the Station, Chang has invested hundreds of thousands of dollars in upgrades and equipment, and continues to explore other options for maximizing the Station's service potential, including through the use translators.¹¹ Chang has also made significant investments in new programming for the Station. While he initially operated one of the Station's digital multicast channels as an affiliate of the Retro Television Network, that affiliation has

⁷ See *Capital Foothill Broadcasters*, Memorandum Opinion and Order, 4 FCC Rcd 1429 (1989). KQSL was initially authorized as a satellite of KRCR-TV, Redding, California. KQSL (operated as KFWU) later served as a primary station with KTNC-TV, Concord, California serving as its satellite. See *KTNC Licensee, LLC Petition for Modification of the San Francisco, California DMA*, Memorandum Opinion and Order, 18 FCC Rcd 16269, 16276 at n. 51 (2003).

⁸ See FCC File Nos. BALCT-20080523ADD, BALCT-20090317AAO (consummated October 15, 2009).

⁹ See FCC File No. BLSTA-20091102ACU.

¹⁰ See FCC File No. BALCDT-20100709AIG,

¹¹ Declaration of Jeff Chang.

been terminated, and Chang is developing a new, unique, and truly local programming service devoted to issues of importance to Bay Area residents, with a particular focus on the technology sector and on programming serving the Asian and Asian-American residents of the market.¹²

The Station has acquired hyper-local news and information programs such as *Silicon Valley Entrepreneurs*, *California Life (Bay Area Edition)*, *Future Talk*, and *The Ventures Program from Stanford University*. The Station has also been working to produce documentaries such as *Silicon Valley Stories* and *San Francisco Flashback*, and has worked to incorporate a real-time server to provide continuous morning traffic reports for the entire Bay Area. Chang has also obtained programming designed to specifically serve the numerous Asian and Asian-American residents of the Cable Communities and the rest of the DMA.¹³

In light of the Station's historical status as a satellite station, the lack of cable carriage relied on by Comcast should be given little weight. Indeed, for many years the Station's programming was in fact carried on cable systems in the Cable Communities, and throughout the San Francisco Bay Area, through carriage of KTNC-TV, its Concord satellite station. As explained above, under the new ownership of Chang, the Station no longer operates as a satellite, and is working to provide a unique, local programming service to the market. At the least, the Bureau should reserve judgment on the local service provided by the Station until it has been afforded the opportunity to implement its new programming plans.

II. Fort Bragg is Economically, Politically, and Socially a Part of the San Francisco Market

Although most of the Cable Communities are beyond the 36 dBu contour of the Station, many of those communities are nonetheless closely linked with the Fort Bragg area politically,

¹² *Id.*

¹³ *Id.*

socially, and economically.¹⁴ Fort Bragg is connected to a number of the Cable Communities through their common inclusion in California's First Congressional District of the United States House of Representatives.¹⁵ This District includes Fort Bragg and Mendocino County, as well as significant portions of Sonoma and Napa counties, including the Cable Communities of Napa, Yountville, Calistoga, Cloverdale, Windsor, Healdsburg, and Sonoma.

Fort Bragg is also physically connected to the Cable Communities through numerous transportation links. While Comcast is technically correct that no single Interstate highway directly connects Fort Bragg and the Cable Communities, this claim is highly misleading.¹⁶ Historic California State Route 1 provides a direct link down the coast from Fort Bragg to the heart of San Francisco. This highway provides a popular link between the communities for travel, tourism, and commercial traffic. In addition, State Route 20 provides a direct link from Fort Bragg to United States Route 101, which travels through many of the Cable Communities into the heart of San Francisco. The Mendocino Transit Authority uses these routes to provide public transportation service between Fort Bragg and Sonoma County, including the communities of Windsor and Santa Rosa.¹⁷ Connecting daily public transportation service is also available through Marin County to downtown San Francisco, directly serving the communities of Novato, Petaluma, and Rohnert Park.¹⁸ Further connections are available to other communities throughout the San Francisco area.

¹⁴ Chang also reaffirms his commitment to provide, at his own cost, a good quality signal at each system headend for which he seeks carriage.

¹⁵ See http://nationalatlas.gov/printable/images/pdf/congdist/CA01_110.pdf.

¹⁶ Petition at 7.

¹⁷ See <http://www.4mta.org/schedules/NorthCoastFinal.pdf>.

¹⁸ See <http://www.4mta.org>; <http://goldengatetransit.org>.

The easy and scenic drives from San Francisco to Fort Bragg also make the area a popular tourist destination.¹⁹ In combination with tourism, the wine and wine-making industry further links Fort Bragg and Mendocino County with many of the other Cable Communities. The North Coast Wine Region, a designated American Viticultural Area recognized by the Alcohol and Tobacco Tax and Trade Bureau, includes all or part of the counties of Mendocino, Humboldt, Lake, Napa, Sonoma, Marin, and Solano.²⁰ The popularity of Fort Bragg among Bay Area residents is also evidenced by the inclusion of multiple Fort Bragg restaurants as top picks in the Zagat Guide to San Francisco Bay Area Restaurants.²¹

Further demonstrating the economic nexus between Fort Bragg and the rest of the market, Comcast itself, in its promotional materials available to potential advertisers, includes its Mendocino County systems as part of its San Francisco market.²² The Bay Area News Group, the Bay Area division of newspaper publisher MediaNews Group, also includes the *Fort Bragg Advocate News* alongside its newspapers in San Jose, Oakland, and throughout the market.²³

While Comcast asserts that only a small number of residents of the Cable Communities commute to Fort Bragg's Mendocino county, it ignores evidence that a steadily increasing number of persons who work in the Cable Communities live in Mendocino county. Statistics from the same sources cited by Comcast show that between 1980 and 2000, the number of

¹⁹ http://www.cawatchablewildlife.org/hywy1_num1.htm

²⁰ 27 C.F.R. § 9.30 (2010); see also <http://california-vineyards.com/wine-resources/north-coast-wineries.aspx> (Cable Communities located in these counties include Cloverdale, Healdsburg, Windsor, Santa Rosa, Sebastopol, Rohnert Park, Sonoma, Petaluma, Novato, San Rafael, Sausalito, Napa, Yountville, St. Helena, Calistoga, and Vallejo.)

²¹ See <http://www.fortbragg.com/content/fort-bragg-restaurants-get-top-zagat-ratings>.

²² <http://www.comcastspotlight.com/markets/SF/311/coverage-overview>

²³ <http://info.bayareanewsgroup.com/online-print-ads-direct-marketing/contact/home-delivery-and-circulation>.

Mendocino county residents commuting to the Bay Area nearly tripled;²⁴ 2010 census data are likely to show that this trend has continued. Clearly, Fort Bragg has a close economic, political, and social nexus with the central Bay Area and many of the cable Communities.

III. KQSL Delivers a Unique, Local Programming Service

In its Petition, Comcast claims that the Cable Communities should be deleted because the Station fails to deliver “truly local” service, and that such service is provided by other stations. This is simply inaccurate. Comcast erroneously claims that the Station is an affiliate of the Retro Television Network (“Retro TV”), and that its programming is therefore not “local” and is duplicated by another station in the market, KCNS, San Francisco.²⁵ In fact, KCNS only began carrying Retro TV programming when KQSL stopped carrying that programming.²⁶ Moreover, as noted above, the Station is in the process of developing “truly local” programming designed to specifically focus on the high tech industry, and on Asian and Asian-American viewers in the Cable Communities. The Station’s anticipated mix of programming is not found on any other station, and indeed, KCNS, one of the stations Comcast relies on as a source of “Asian language/targeted” programming, has now apparently dropped its primary Chinese language programming in favor of the very Retro TV programming Comcast does not consider to be local.²⁷

In any event, the existence of other stations providing local service to the Cable Communities should not serve as a bar to the continued inclusion of those communities in the

²⁴ http://www.mtc.ca.gov/maps_and_data/datamart/census/county2county/table3coco.htm

²⁵ Petition at 9.

²⁶ Declaration of Jeff Chang.

²⁷ See “RTV Finds a Home in San Francisco: The network of classic TV shows adds Titan’s KCNS, which drops its Chinese-language programming,” *TVNewsCheck*, April 4, 2011, available at <http://www.tvnewscheck.com/article/2011/04/04/50321/rtv-finds-a-home-in-san-francisco>.

Station's market.²⁸ Rather, in the case of a new station delivering unique targeted programming, such as KQSL, this should, if anything, enhance the Station's claim for inclusion of the Cable Communities in its market in furtherance of the goals of the Cable Act.²⁹

The evidence submitted by Comcast regarding audience viewing patterns and ratings for KQSL's programming must also be discounted in light of the history of the Station. As noted above, the previous licensee of the Station had suspended operations throughout most of 2010. This fact alone explains why the 2010 Nielsen survey relied on by Comcast does not show viewership for the Station. Under new ownership, and with new programming, the Station is now working to establish additional viewership in the Cable Communities and throughout its market. As also noted above, Chang is working to deliver a targeted programming service for Asian and Asian-American residents and those interested in the high tech sector. Recognizing the difficulty such "specialty" stations have in establishing an audience, the Commission has historically discounted carriage and ratings information for such stations.³⁰ Similarly, the Bureau here should recognize the difficult situation facing KQSL as a "new" station with specialized programming and provide the Station's new owner an opportunity to implement his planned local programming for the Station before summarily deleting all of the Cable Communities from the Station's market.

²⁸ See, e.g. *Paxson San Jose License*, 12 FCC Rcd at 17526, ¶ 13.

²⁹ *Id.*

³⁰ See, e.g. *Norwell Television, LLC; For Modification of the Boston, Massachusetts DMA*, Memorandum Opinion and Order, 16 FCC Rcd 21970 (2001).

Conclusion

As demonstrated herein, Fort Bragg is closely connected economically, socially, and politically to the Cable Communities. KQSL is, for all intents and purposes, a “new” station in this market, and as such has never had an opportunity to establish cable carriage or ratings in the market. Chang, the new licensee of the Station, is working to develop a unique and local programming mix to serve the market. To delete the Cable Communities from KQSL’s market would undermine these efforts, would ignore the history of the Station, and would disserve residents of the Cable Communities and the purposes of the 1992 Cable Act. For the foregoing reasons, Jeff Chang respectfully requests that the Commission deny Comcast’s Petition for Special Relief and maintain the Cable Communities as part of KQSL’s market.

Respectfully submitted,

JEFF CHANG

By: 

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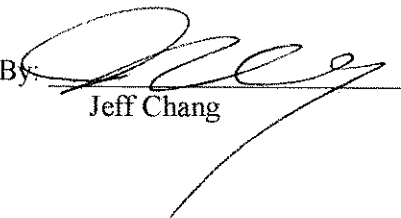
ATTACHMENT A

DECLARATION OF JEFF CHANG

DECLARATION OF JEFF CHANG

I, Jeff Chang, individual licensee of KQSL(TV), Fort Bragg, California (FCC Facility ID No. 8378), hereby declare, under penalty of perjury, the following:

1. I have read the foregoing Opposition to Petition for Special Relief, and the facts contained therein are true, correct, and accurate to the best of my knowledge, information, and belief.
2. To the best of my knowledge, information, and belief, KQSL is currently the only full-power television station in the United States wholly owned by a Chinese-American, and one of only two minority-owned stations in the San Francisco-Oakland-San Jose DMA.
3. Since acquiring KQSL, I have invested hundreds of thousands of dollars in upgrades and equipment, and I am continuing to explore other options for maximizing the Station's service potential, including through the use translators.
4. While I initially operated one of KQSL's digital multicast channels as an affiliate of the Retro Television Network, that affiliation has been terminated, and Retro TV programming is no longer carried on the station. To the best of my knowledge, information, and belief, the Retro Television Network has been carried on television station KCNS, San Francisco, since KQSL ceased broadcast on that programming.
5. I am now developing a new, unique, and truly local programming service devoted to issues of importance to Bay Area residents, with a particular focus on the technology sector and on programming serving the Asian and Asian-American population in the market.
6. I have acquired rights for KQSL to broadcast hyper-local news and information programs such as *Silicon Valley Entrepreneurs*, *California Life (Bay Area Edition)*, *Future Talk*, and *The Ventures Program from Stanford University*.
7. KQSL has also been working to produce documentaries such as *Silicon Valley Stories* and *San Francisco Flashback*, and has worked to incorporate a real-time server to provide continuous morning traffic reports for the entire Bay Area.
8. I have obtained programming for KQSL designed to specifically serve the numerous Asian and Asian-American residents of the Cable Communities and the rest of the San Francisco-Oakland-San Jose DMA.

By: 
Jeff Chang

Dated: August 1, 2011

CERTIFICATE OF SERVICE

I, Johanna Chang, do hereby certify on this 1st day of August, 2011 that a true and correct copy of the foregoing "Petition for Special Relief has been sent via U.S. mail, postage prepaid to the following:

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Ms. Sally Logothetti
Administrative Services Manager
County of Santa Clara
70 West Hedding Street, 11th Floor
San Jose, CA 95110

Mr. Dave Anderson
City Manager
City of Saratoga
13777 Fruitvale Avenue
Saratoga, CA 95070

Mr. Jack Griffin
City Manager
City of Sebastopol
PO Box 1776
7120 Bodega Ave.
Sebastopol, CA 94573

CERTIFICATE OF SERVICE (continued)

Mr. Keith Hanson
Real Property Manager
Solano County General Services
675 Texas Street, Suite 2500
Fairfield, CA 94533

Ms. Terry Lovold
Administrative Services Officer II
County of Sonoma
2300 County Center Dr., B-100
Santa Rosa, CA 95403

Ms. Mary Neilan
City Manager
City of St. Helena
1480 Main St.
St. Helena, CA 94574

Mr. Craig Middleton
Executive Director
The Presidio Trust
34 Graham Street
PO Box 29052
San Francisco, CA 94129

Ms. Mirian Saez
Director of Island Operations
Treasure Island Development Authority
410 Avenue of the Palms
Bldg. #1, 2nd Floor
San Francisco, CA 94130

Mr. Robert F. D. Adams
City Manager
City of Vallejo
555 Santa Clara Street
Vallejo, CA 94590

Ms. Linda Kelly
City Manager
City of Sonoma
No. 1 The Plaza
Sonoma, CA 94576

Mr. Doug Hollis
IT Department
City of South San Francisco
PO Box 711
200 Linden Avenue
So. San Francisco, CA 94080

Mr. Cuong Nguyen
Director of Information Technology
City of Sunnyvale
City Hall
456 West Olive Avenue
PO Box 3707
Sunnyvale, CA 94088

Ms. Peggy Curran
Town Manager
Town of Tiburon
1155 Tiburon Blvd.
Tiburon, CA 94920

Mr. Tony Acosta
Deputy City Manager
City of Union City
34009 Alvarado-Niles Road
Union City, CA 94587

Ms. Gayle Vassar
Communications & Outreach Manager
City of Walnut Creek
1666 N. Main Street
Walnut Creek, CA 94596

CERTIFICATE OF SERVICE (continued)

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Assistant Town Manager
Town of Windsor
PO Box 100
9291 Old Redwood Hwy.
Windsor, CA 95492

Ms. Susan George
Town Manager
Town of Woodside
2955 Woodside Road
Woodside, CA 94062

Mr. Steve Rogers
Town Manager
Town of Yountville
6550 Yount St.
Yountville, CA 94599

KBCW Inc.
855 Battery Street
San Francisco, CA 94111-1575

KCNS
1550 Bryant Street
Suite 740
San Francisco, CA 94103

KDTV License Partnership GP
50 Fremont Street
41st Floor
San Francisco, CA 94105

KFSF
50 Fremont Street
41st Floor
San Francisco, CA 94105

KFTY
533 Mendocino Avenue
Santa Rosa, CA 94501

KGO Television Inc.
900 Front Street
San Francisco, CA 94111-1450

KICU
2102 Commerce Drive
San Jose, CA 95131

KKPX
660 Price Avenue
Suite B
Redwood City, CA 94063

KNTV
2450 N 1st Street
San Jose, CA 95131

KOFY
2500 Marin Street
San Francisco, CA 94124

KPIX
855 Battery Street
San Francisco, CA 94111-1575

KRON
1001 Van Ness Avenue
San Francisco, CA 94109

KSTS
2349 Bering Drive
San Jose, CA 95131

CERTIFICATE OF SERVICE (continued)

KTLN
100 Pelican Way
Suite E-F
San Rafael, CA 94901

KTSF
Lincoln Broadcasting Co.
100 Valley Drive
Brisbane, CA 94005

KTEH
Northern California Public Broadcasting Inc.
2601 Mariposa St.
San Francisco, CA 94110-1426

KQED
Northern California Public Broadcasting Inc.
2601 Mariposa St.
San Francisco, CA 94110-1426

KRCB
Rural California Broadcasting Corp.
5850 LaBath Ave.
Rohnert Park, CA 94928

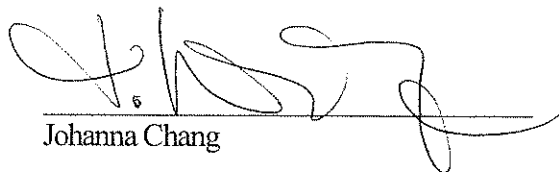
KTNC
1700 Montgomery Street
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San Francisco, CA 94111

KTVU Partnership
PO Box 22222
Oakland, CA 94623

Frederick W. Grioux
Davis Wright Tremaine LLP
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KMTP-TV
Minority Television Project Inc.
1504 Bryant St.
San Francisco, CA 94103

KCSM -TV
San Mateo County Community College
District
1700 W. Hillsdale Blvd.
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Johanna Chang